

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JOSCELYN QUIROZ and SAMUEL  
QUIROZ, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

RIDER UNIVERSITY,

Defendant.

Civ. No. 3:20-cv-05620-FLW-  
DEA

**STIPULATION EXTENDING  
TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANT’S  
MOTION TO DISMISS AND  
TO FILE A FIRST AMENDED  
COMPLAINT**

WHEREAS, Plaintiff Samuel Schoening filed a Complaint (ECF No. 1) on May 6, 2020 alleging various state law claims against Rider University (“Defendant”);

WHEREAS, Defendant filed a motion to dismiss the Complaint on August 3, 2020 (ECF No. 12);

WHEREAS, Plaintiff’s deadline to respond to the motion to dismiss is August 25, 2020;

WHEREAS, Plaintiff’s deadline to file an amended complaint pursuant to Rule 15 is August 24, 2020;

WHEREAS, Plaintiff desires to file a first amended complaint pursuant to Rule 15; and

WHEREAS, Plaintiff requests, and Defendant does not oppose, an extension for Plaintiff to file her first amended complaint and respond to the motion to dismiss up to and including September 8, 2020.

**THE PARTIES STIPULATE AS FOLLOWS:**

1. Plaintiff shall have up to and including September 8, 2020 to either file her First Amended Class Action Complaint or to respond to Defendant's motion to dismiss.

2. Defendant's agreement to the extension of time set forth in this Stipulation is without waiver of any defenses or motions Defendant may assert or file in response to the First Amended Complaint.

Dated: August 19, 2020

**BURSOR & FISHER, P.A.**

By: /s/ Philip L. Fraietta  
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Dated: August 19, 2020

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*Attorneys for Defendant*

SO ORDERED

Dated: August 20, 2020

/s/ Freda L. Wolfson  
Hon. Freda L. Wolfson  
U.S. Chief District Judge